

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

John T. Moore,

Debtor.

Case No. 23-10084-amc

Chapter 13

Related to ECF No. 50

**Debtor's Objection to Motion for Relief from Stay filed by Freedom  
Mortgage Corporation**

**AND NOW**, Debtor John T. Moore, by and through his attorney, hereby objects to the Motion for Relief from Stay filed by Freedom Mortgage Corporation. Because the purported arrearage that gave rise to the Motion can be timely paid directly or through the chapter 13 plan, no grounds for relief exist and the Motion must be denied.

**NOW, THEREFORE**, the Debtor asks this Court to deny the Motion in the form of order attached and to grant such other and further relief in his favor as may be necessary and proper under the law.

Date: December 12, 2023

CIBIK LAW, P.C.  
*Counsel for Debtor*

By: /s/ Michael A. Cibik  
Michael A. Cibik (#23110)  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102  
215-735-1060  
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**Certificate of Service**

I certify that on this date I caused a true and correct copy of the Debtor's Objection to Motion for Relief from Stay filed by Freedom Mortgage Corporation to be served on all parties on the clerk's service list through the CM/ECF system.

Date: December 12, 2023

/s/ Michael A. Cibik  
Michael A. Cibik

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

In re:

John T. Moore,  
  
Debtor.

Case No. 23-10084-amc

Chapter 13

Related to ECF No. 50

**Order Denying Motion for Relief from Stay filed by Freedom Mortgage Corporation**

**AND NOW**, upon consideration of the Motion for Relief from Stay filed by Freedom Mortgage Corporation, and the Debtor's objection thereto, and after notice and hearing, it is hereby **ORDERED** that the Motion is **DENIED**.

Date:

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Ashely M. Chan  
U.S. Bankruptcy Judge